

WIGGINS CHILDS  
PANTAZIS FISHER  
GOLDFARB PLLC  
Advocates & Litigators

A PROFESSIONAL LIMITED LIABILITY COMPANY  
1211 CONNECTICUT AVENUE, N.W. · SUITE 420 · WASHINGTON, D.C. 20036  
Direct Dial: 202-467-4489 · Fax: 205-314-0805  
Email:TFleming@wigginschilds.com · Web:www.wigginschilds.com

TIMOTHY B. FLEMING  
OF COUNSEL

January 2, 2019

**Via ECF and Federal Express**

The Honorable George B. Daniels  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

The Honorable Sarah Netburn  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *In Re Terrorist Attacks on September 11, 2001*, 1:03-md-01570 (GBD)(SN)

Dear Judge Daniels and Magistrate Judge Netburn:

The undersigned is one of the attorneys representing the plaintiffs in each of the following cases in which we have filed Short Form Complaints against the Kingdom of Saudi Arabia.

- *Rosenthal, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11866
- *Soulas, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11909
- *Homer, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11910
- *McGuire, et al. v. Kingdom of Saudi Arabia*, No. 1:19-cv-00031

I note that some family members were placed in different cases because of varying times at which they elected to join the litigation, and the filing papers had already been prepared for filing. Should the Court desire us to reformat the plaintiff groupings, we will of course do so.

The cases are expected to be assigned to Judge Daniels as possibly related to the Multi-District Litigation 1:03-md-01570-GBD-SN (the “MDL”). In accordance with July 10, 2018 Amended Order Approving Notices to Conform, Short Form Complaints, and Notices of Amendment (ECF 4045) in the MDL, I write respectfully to request that the above-referenced cases be made part of the MDL *In Re Terrorist Attacks on September 11, 2001*, 1:03-md-01570 (GBD)(SN).

Respectfully Submitted,



Timothy B. Fleming  
*One of the Attorneys for the Homer, Rosenthal,  
Soulas, and Adler Plaintiffs*

cc: All MDL counsel (via ECF)

BIRMINGHAM, AL  
DELAND, FL  
NASHVILLE, TN  
WASHINGTON, D.C.